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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re

Amendment of Section 73.202(b)
FM Broadcast Stations

Benavides, Bruni, Rio Grande City
and Victoria, Texas

MM Docket 95-74
RM No. 8579

RM No. _____
RM No. _____

DOCKET FILE COPY ORIGINAL

To: The Commission

SUPPLEMENT TO COMMENTS

Sound Investments Unlimited, Inc. ("Sound"), licensee of FM station KCTM, Rio Grande City, Texas, hereby supplements its comments, filed September 14, 1995, on its counterproposal in the above-captioned proceeding.¹

Sound, in those comments, noted that adoption of its counterproposal would allow for provision of a new aural service to an area that is not well served at present. Comments at 3. Sound suggested that the Commission's engineering staff was in a better position to analyze the proposal from the standpoint of the FM allotment priorities than Sound's own limited resources permit.

¹ Sound hereby requests leave for the filing of the attached material at this time. Given the press of other business with which the Commission has to deal, it will probably be a matter of months before the Commission will be in a position to resolve the competing channel allotment requests submitted in this case. Accordingly, consideration of this information will not delay the issuance of a report and order in this proceeding. On the contrary, acceptance of the attached data will actually expedite a resolution, by providing significant information showing even more clearly that the public interest would be served by adoption of the Sound counterproposal,

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Since the filing of the Comments, legislation has passed the Senate that would reduce the FCC's budget in a way that would severely cripple the agency's ability to evaluate competing allotment proposals in the public interest. Against the possibility that such budget cuts might prevent the Commission from quantifying the degree to which the highest allotment priorities would be served by the Sound proposal, Sound, at considerable sacrifice, has requested that Peter Gureckis, a highly respected communications consulting engineer, examine this matter.

Sound has taken this step not only in an effort to assist the Commission with all relevant facts, but also in view of the critical nature of the proposed upgrade to the ability of KCTM to survive as a viable broadcast outlet. Over the eleven years of KCTM's operation, it has served its public in a way that merits Commission consideration of the information Mr. Gureckis has discovered. Sound is a present licensee of the Commission, and has been for the past decade and more. Its proposal is therefore more significant than the paper plans of a party that has thus far failed to implement the authorization it applied for.


Mr. Gureckis has ascertained that the Sound counterproposal will provide a **first aural service** to a population of 4,533, and a second such service to a population of some 2,360. Given the overriding significance of service to unserved and underserved areas, this data support's Sound's request that the Commission modify the license of

station KCTM to specify operation on Channel 298C2 in Rio Grande City, Texas, as set forth in the counterproposal of July 24, 1995.

Respectfully submitted,

SOUND INVESTMENTS UNLIMITED, INC.

By:


Barry D. Wood

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Its Attorneys

October 31, 1995

PETER V. GURECKIS & ASSOCIATES

ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of **SOUND INVESTMENTS UNLIMITED, INC.** (Sound Investment) to supply an engineering study of Other Nighttime Aural Services Populations and Areas available within the Gain Area for the proposed allotment of Channel 298C2 to Rio Grande City, Texas in MM Docket 95-74, RM No. 8690.

Sound Investments is the licensee of Station KCTM, Channel 276A which operates with a power of 1.4 KW and a HAAT of 128 meters.

Sound Investments request the allotment of Channel 298C2 to Rio Grande City at the following site coordinates:

N. Lat. : 26° 22' 42"
W. Long.: 98° 48' 48"

Figure 1 is a map showing the 60 dbu contour of KCTM's present operation on Channel 276A and 60 dbu contour for KCTM's proposed operation on Channel 298C2 at the above reference site.

At bearing 330° the power was reduced to 6 KW and 100 meters or the equivalent of 2.7 KW at 150 meters HAAT. Also, at bearing 307° the power was reduced to 8 KW at 150 meters HAAT. In all other directions the proposed power is 50 KW at 150 meters HAAT. (See Figure 2)

Also, shown on Figure 1 are the location of the 60 dbu contour for other FM stations. These stations are tabulated on Figure 3.

Further, Figure 1 shows that only one nighttime AM station places its interference-free contour within the proposed Gain Area. All other nighttime AM stations studied do not place there interference-free contour within the

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Gain Area.

It should be noted that no Loss Area results in the proposed allotment of Channel 298C2 to Rio Grande City.

As seen from Figure 1 the proposed allotment of Channel 298C2 will provide nighttime service to "White" and "Grey" areas, a first aural service and a second service priorities for FM assignments.

The populations and areas are as follows:

	<u>Population</u> ^{/1}	<u>Area (Sq. Km)</u>
KCTM Present 60 dbu	27,651	486
KCTM Proposed 60 dbu	73,241	1,430
Common Area	27,651	486
Gain Area	45,590	944
Percentage of Gain Area to KCTM Present 60 dbu	165%	194%
First Service Area	4,533	626
Second Service Area	2,360	100

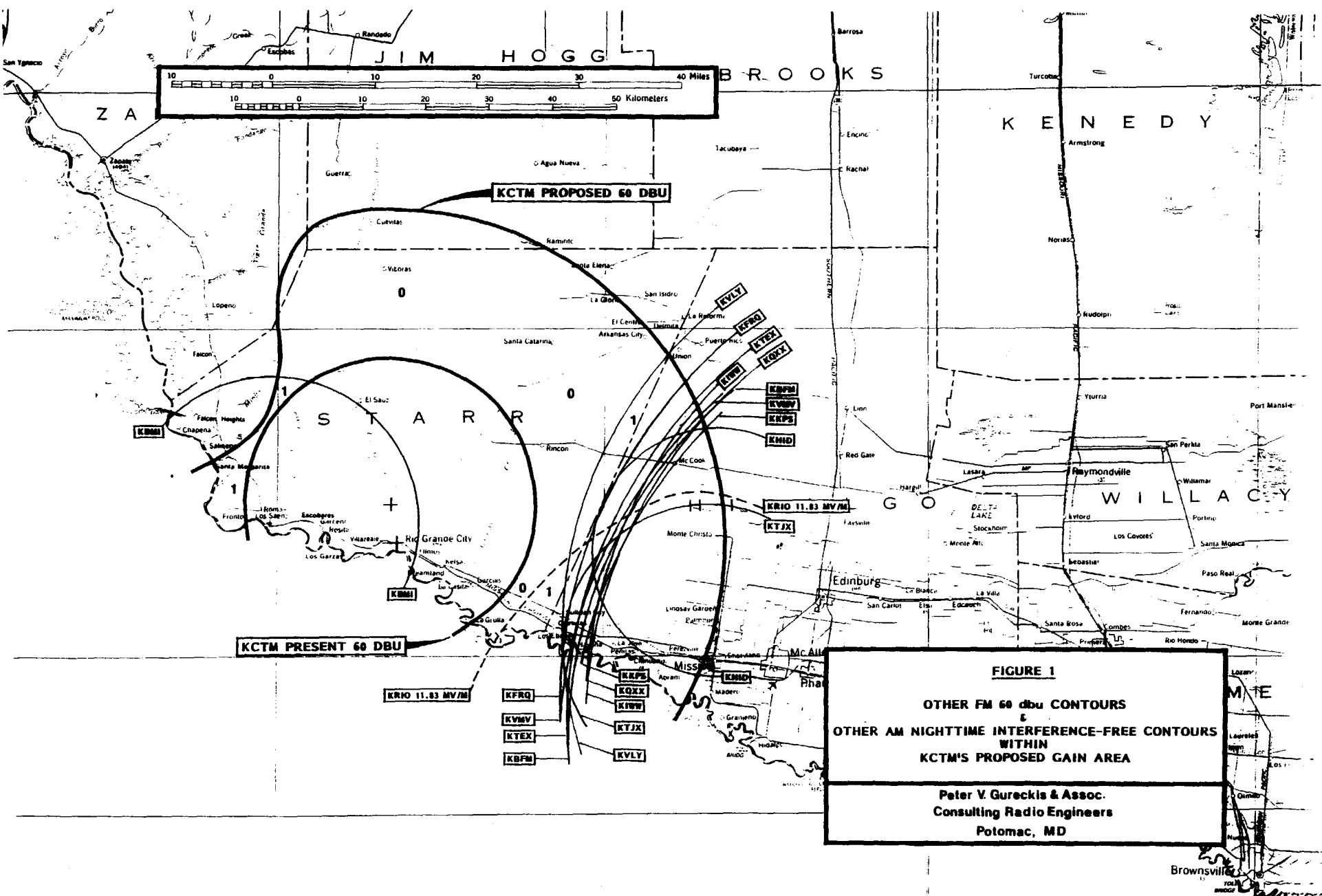
/1 1990 U.S. Census

I, **PETER V. GURECKIS**, do hereby certify and declare under penalty of perjury that I am a consulting engineer with an office located at 10410 Windsor View Drive, Potomac, Maryland 20854-4024.

All of the above statements and computations made in this statement were made by myself or under my direct supervision and that all facts and information contained herein are true and correct to the best of my knowledge, except where stated to be on belief, and as to that information, I believe it to be true.

Date: October 30, 1995


Peter V. Gureckis



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FIGURE 2

PRESENT & PROPOSED 60 dbu CONTOURS

1. Present Operation - Channel 276A
60 dbu Contour - 22.7 Kilometers

2. Proposed Operation - Channel 298C2

<u>Bearing</u>	<u>HAAT (M)</u>	<u>ERP (KW)</u>	<u>Distance To 60 dbu Contour</u>
0°	150	50	52.2
45°	150	50	52.2
90°	150	50	52.2
135°	150	50	52.2
180°	150	50	52.2
225°	150	50	52.2
270°	150	50	52.2
307°	150	2.7	22.7
330°	150	8	36.4

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FIGURE 3

TABULATION OF OTHER AURAL SERVICES

1. FM STATIONS

<u>CALL</u>	<u>LOCATION</u>	<u>FACILITY</u>
KBMI	Roma, Texas	Ch. 249A, 3 KW, 91m
KHID	McAllen, Texas	Ch. 201A, 2.1 KW, 77m
KTJX	Mission, Texas	Ch. 288A, 3 KW, 87m
KVLY	Edinburg, Texas	Ch. 300C1, 98 KW, 219m
KBFM	Edinburg, Texas	Ch. 281C, 100 KW, 305m
KFRQ	Harlington, Texas	Ch. 233C, 100 KW, 353m
KIWW	Harlington, Texas	Ch. 241C, 100 KW, 301m
KQXX	McAllen, Texas	Ch. 253C, 100 KW, 304m
KTEX	Brownsville, Texas	Ch. 262C, 99 KW, 343m
KVMV	McAllen, Texas	Ch. 245C, 100 KW, 350m
KKPS	Brownsville, Texas	Ch. 258C, 100 KW, 316m

2. AM NIGHTTIME STATIONS

KRID	McAllen, Texas	910 KHz, 5 KW, DA-2, U
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Note - The following stations do not provide an interference-free contour to the "First" or "Second" Service Areas. These stations are KURV (710 KHz), KVJY (840 KHz), KVOZ (890 KHz), KUBR (12.10 KHz), KRGE (1290 KHz), and KIRT (1580 KHz).

CERTIFICATE OF SERVICE

I, Barry D. Wood, hereby certify that I have, this 31st day of October, 1995, caused to be sent by U.S. first-class mail, postage-prepaid, a true and correct copy of the foregoing "Supplement to Comments" to the following:

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